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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

October 7, 2008

TO: Internal File

THRU: James D. Smith, Permit Supervisor *JS 09/08/08*

FROM: Wayne H. Western, Environmental Scientist III *WHW*

RE: Reduction of Permit Area – Gas Well and Pipeline, Andalex Resources, Inc., Centennial Mine, C/007/0019 and Task # 3049

SUMMARY:

On September 23, 2008, the Permittee submitted an amendment to reduce the permit boundary by 11.92 acres. The reason for the permit area reduction is to remove areas that will be used by Oso Oil & Gas to drill natural gas wells over the sealed-up longwall gob areas.

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TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

PERMIT AREA

Regulatory Requirements: 30 CFR 783.12; R645-301-521.

Analysis:

The Permittee met the requirements of this section. The Permittee included tables that showed the changes to the permit area.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

The Permittee met the minimum requirements of this section. The Permittee will not changes any facilities or installations in connection with the permit area reduction.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

SUBSIDENCE CONTROL PLAN

Regulatory Reference: 30 CFR 784.20, 817.121, 817.122; R645-301-521, -301-525, -301-724.

Analysis:

Subsidence Control Plan

The Permittee met the requirements of this section. In Appendix Z, Legal Description of the OSO Gaswell and Pipeline, the Permittee provided information that indicated that for the past for years, the area has been stable and there has been no significant subsidence. The Division usually assumes that with longwall mining that subsidence will be at least 80% completed within the first six months. After four year of no significant subsidence the Division assumes that subsidence had been completed.

Performance Standards For Subsidence Control

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

MAPS, PLANS, AND CROSS SECTIONS OF MINING OPERATIONS

Regulatory Reference: 30 CFR Sec. 784.23; R645-301-512, -301-521, -301-542, -301-632, -301-731, -302-323.

Analysis:

Affected Area Maps

The Permittee met the requirements of this section. The Division considers that for the Centennial Mine the affected area is equal to the permit area. The Permittee showed the affected area (permit area) on several maps including Plate 1, Centennial Project General Location Map.

Mining Facilities Maps

The Permittee met the requirements of this section. Since there are no changes to the mine facilities no changes to those maps are needed.

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Mine Workings Maps

The Permittee met the requirements of this section. Since there are no changes to the mine workings no changes to those maps are needed.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

RECLAMATION PLAN

GENERAL REQUIREMENTS

Regulatory Reference: PL 95-87 Sec. 515 and 516; 30 CFR Sec. 784.13, 784.14, 784.15, 784.16, 784.17, 784.18, 784.19, 784.20, 784.21, 784.22, 784.23, 784.24, 784.25, 784.26; R645-301-231, -301-233, -301-322, -301-323, -301-331, -301-333, -301-341, -301-342, -301-411, -301-412, -301-422, -301-512, -301-513, -301-521, -301-522, -301-525, -301-526, -301-527, -301-528, -301-529, -301-531, -301-533, -301-534, -301-536, -301-537, -301-542, -301-623, -301-624, -301-625, -301-626, -301-631, -301-632, -301-731, -301-723, -301-724, -301-725, -301-726, -301-728, -301-729, -301-731, -301-732, -301-733, -301-746, -301-764, -301-830.

Analysis:

The Permittee met the minimum requirements of this section. Since the area that will be removed from the permit boundaries does not include any disturbed land, no reclamation is needed.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

The Permittee met the requirements of this section. Since the permit area reduction does not involve any disturbed area the bond will not be effected by the permit area reduction.

Findings:

The information provided in the proposed amendment is considered adequate to meet the requirements of this section.

RECOMMENDATIONS:

The Division should approve the amendment on condition that the Permittee